

# EXHIBIT 23



1 LUCAS PORTER

2 specifically.

3 | Q What's the IRP?

4                   A                   The integrated resource  
5                   plan.

6 Q Which IRP are you're  
7 referring to when you say the IRP?

8 | A The 2019 IRP.

9 Q Do you recall what that  
10 analysis says?

11 A No, I do not.

12 Q Just to confirm, you -- did  
13 you discuss anything else with respect to  
14 any energy efficiency with Mr. Gil?

15 A No.

16 Q And when you say that the  
17 base case complies with Act 17, you mean  
18 that the base case assumes a 30 percent  
19 reduction in energy usage by 2040?

20 A That's correct.

21 Q And as far as you know,  
22 PREPA has not performed any analysis of  
23 whether that's realistic?

24 A I don't know that to be the  
25 case.

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2 Q Does PREPA know -- has PREPA  
3 performed any analysis of whether  
4 compliance with Act 17 is realistic?

5 MS. PAVEL: Objection. This  
6 is beyond the scope of the topics  
7 that we agreed to. You could answer  
8 in your own capacity, if you know.

13 MS. PAVEL: So are you  
14 asking if analysis was done in  
15 connection with preparing the base  
16 case or just generally?

19 A In connection with preparing  
20 the base case, there was not.

21 Q And just to close the loop  
22 on that and draw an objection, what about  
23 generally?

24 MS. PAVEL: Same objection,  
25 asked and answered.

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2           Q            You can answer.

3           A            Potentially in the IRP, but  
4    I don't know for sure.

5           Q            You also said that you  
6    discussed electric vehicles with Mr. Gil;  
7    is that right?

8           A            Yes.

9           Q            What did you discuss about  
10   electric vehicles with Mr. Gil?

11          A            I think we discussed the  
12   difference between the base case and the  
13   alternative forecast.

14          Q            When you refer to the  
15   alternative forecast, what are you  
16   referring to?

17          A            The alternative load  
18   forecast in the 2022 certified fiscal  
19   plan.

20          Q            What difference is there  
21   with -- between those two forecasts with  
22   respect to electric vehicles?

23          A            So the base case has a lower  
24   uptake of electric vehicles than the  
25   alternative forecast.

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2 A Compared with the base  
3 forecast that was submitted?

4 Q Yes .

5 A I don't believe there was.

6 Q Was the alternative forecast  
7 included in the final draft prepared by  
8 PREPA?

9 A Not that I recall, no.

10 Q So the oversight board added  
11 the alternative forecast?

12                   A                   Yes. I believe so. So that  
13 could be an example of a change.

14 Q Were there any differences  
15 with respect to forecasted capital  
16 expenses between the final draft and the  
17 final certified versions of the fiscal  
18 plan?

19 A I don't believe there were.

20 Q Did PREPA or Ankura have the  
21 opportunity to review the alternative  
22 forecast before the certified fiscal plan  
23 was submitted?

24 A I believe we did receive  
25 from LUMA, a worksheet that presented the

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2 alternative forecast. But it was like an  
3 FYI.

4 Q Did PREPA have any  
5 assessment of the merits of that  
6 alternative forecast?

7           A           Not that I recall. And we  
8   weren't asked to provide any.

9 Q How did PREPA -- how did  
10 PREPA or Ankura choose between using the  
11 alternative forecast versus the base  
12 forecast?

13 MS. PAVEL: Objection to  
14 form.

15                   A                   There wasn't a choice for  
16                   us.

17 Q Why did you use the base  
18 forecast?

19 MS. PAVEL: Objection to  
20 form and misstates prior testimony.

21 Q Why did PREPA use the base  
22 forecast in its draft of the fiscal plan?

23 A Because that was the  
24 forecast we were essentially instructed  
25 to use. It's the forecast that is